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Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Misuse of Internet Protocol (IP) Captioned Telephone Service*, CG Docket 13-24 and
Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities, CG Docket 03-123.

Dear Ms. Dortch:

On April 27, 2017, Mike Ellis, Claudia Gordon, Charles McKee, and the undersigned counsel on behalf of Sprint Corporation (“Sprint”) met with Zenji Nakazawa, Acting Public Safety and Consumer Protection Advisor to Chairman Pai.

The purpose of the meeting was to discuss IP-based Captioned Telephone Service (“IP CTS”). Sprint recognized the Commission’s concerns about the growth of the service and its impact on the Interstate TRS Fund. Sprint urged the Commission to carefully examine IP CTS in a holistic fashion taking into account all aspects of the service from consumer registration, to service quality, to new technologies, and the rate/rate-setting methodology. Sprint believes the Commission has many regulatory levers at its disposal and that it should carefully monitor and enforce its existing rules while exploring new user registration requirements, annual re-registration, third-party certification, *etc.* Sprint is open to exploring these and other “outside the box” ideas to address core concerns with IP CTS.

Sprint also cautioned against arbitrary rate reductions that will not provide a sustained impact on controlling the growth of IP CTS. Abandoning the Multistate Average Rate Structure (“MARS”) methodology would be an unnecessary departure from a competitively-based rate-setting methodology. An artificial/non-competitive rate could have unintended, negative consequences including diminishing service quality and reducing competition for IP

CTS – ultimately harming the consumers that depend on this important relay service. Additionally, Sprint contends the record regarding alternative cost methodologies is stale; as such, the Commission should refresh the docket with updated information about the current market which has changed significantly since comments were last sought in 2013.

Sprint expressed its desire for a careful, deliberative approach to improving IP CTS and believes a Further Notice of Proposed Rulemaking and/or Notice of Inquiry is the best regulatory vehicle for sustained improvements that will ensure a healthy IP CTS for years to come.

This filing is made in accordance with Section 1.1206(b)(1) of the Commission's rules.¹ In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

/s/ Scott R. Freiermuth

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cc: Mr. Zenji Nakazawa

¹ 47 C.F.R. § 1.1206(b)(2).